

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

KIMBERLY JO WILLIAMS,

Defendant.

I N F O R M A T I O N

BANK FRAUD (18 U.S.C. § 1344)

THE UNITED STATES ATTORNEY CHARGES:

1. At all times material to this Information, Fulton Bank, PNC Bank, First Keystone Bank, First Columbia Bank and Trust, M-C Federal Credit Union, First National Community Bank, and Swineford National Bank/FNB (hereinafter referred to as "the Banks") were financial institutions that operated from a number of locations in the Commonwealth of Pennsylvania. The accounts of the Banks were insured by the Federal Deposit Insurance Corporation.

2. Beginning in or about January of 2009 and continuing thereafter up to on or about November of 2010, in the Middle District of Pennsylvania, and elsewhere, the defendant,

KIMBERLY JO WILLIAMS,

did knowingly execute and attempt to execute a scheme and artifice:

(a) to defraud the Banks; and,

(b) to obtain moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of the Banks by means of false and fraudulent pretenses, representations and promises.

3. It was part of the scheme and artifice to defraud and to obtain money and funds by means of false pretenses, representations and promises that Kimberly Jo Williams obtained checks she knew to be forged which were drawn on open and/or closed accounts at one or more of the Banks. On numerous occasions, Kimberly Jo Williams executed the scheme and artifice to defraud and to obtain money and funds by means of false pretenses, representations and promises in that she caused the forged checks to be deposited and/or cashed at one of more of the Banks and, as a result of the scheme, obtained thousands of dollars in funds of the Banks knowing that she had no right to those funds.

4. It was also part of the scheme and artifice to defraud and to obtain money and funds by means of false pretenses, representations and promises that Kimberly Jo Williams utilized a number of false identities to carry out her improper activities.

In violation of Title 18, United States Code, § 1344.

Dated: December 6, 2011

Peter J. Smith (RISZ)
Peter J. Smith
United States Attorney